



Publisher of Consumer Reports

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Re: Docket No. NHTSA-01-11157

Comments of Consumers Union of US Inc.
to
National Highway Traffic Safety Administration
on
Tire Safety Information
49 CFR Parts 567, 571, 574 and 575
RIN 2127-AI32

Consumers Union (CU) appreciates the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA) Tire Safety Information Notice of Proposed Rulemaking (NPRM). The proposal arises out of the Congressional mandate to NHTSA¹ in the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act of 2000 to provide better, more consumer-friendly information on tires in the aftermath of the broad pattern of Ford/Firestone tire failures and vehicle crashes. The extensive news coverage along with the hearings on the Ford/Firestone crashes, with witnesses describing tire tread separations at high speeds, led many consumers to seek replacement tires both before and after Firestone agreed to launch its massive tire recall. Consumers were finding it hard to identify whether their tires qualified for the recall and replacement program because of the difficulty in reading the information printed on their tires, which was often on the inside of the tire sidewalls. Congress

¹ Section 11 of the TREAD Act, Pub. L. 106-414, Section 30123 of Title 49, United States Code.

mandated that NHTSA develop regulations to make that tire information more readily accessible to consumers.

We note that NHTSA published an Advanced Notice of Proposed Rulemaking (ANPRM) in December 2000, (CU's comments on the ANPRM appear in Docket No. NHTSA-00-8296). The agency has considered the public's comments, gathered new data and done new analyses, and sponsored focus groups to comply with the Congressional mandate exploring how to make tire information more accessible to consumers.

CU's comments below on the NPRM follow NHTSA's categories:

Tire Identification Number (TIN)

- CU appreciates NHTSA's support for larger characters in the TIN and agrees that a uniform TIN font size will greatly improve the TIN's readability. We noted our support in the ANPRM for placing the TIN on both sides of the tire and appreciate NHTSA's intent that this be required.
- We support NHTSA's intent to display the Tire Information Number (TIN) and size designation on both sides of the tire at a size of 6 mm (1/4 in) high.
- The proposed identification number for new and re-tread tires would be more intuitive for consumers with the letters "Prod. Date. ww/yy" above the TIN. The TIN should be arranged with sufficient space between manufacturer's identification mark, date of manufacture, and optional code.

Manual Information

- We noted during the Ford/Firestone investigation that a number of the SUVs that rolled over and crashed because of tread separations were fully loaded or overloaded vehicles. CU believes that consumers generally do not understand that a fully loaded SUV means a higher

center of gravity and hence a greater propensity to roll over. We support NHTSA's efforts to help consumers become better aware of this danger. In this regard, CU believes that the proposed requirement that all manuals include a guide, under the heading, **“Locating and Understanding Load Limit Information”** will be useful for determining proper load limits. As it is laid out in the proposal, this information seems helpful, informative and easily understood.

Even if a large percentage of car owners don't consult them often, they are aware that their owner's manual contains authoritative information on their vehicles and they seek that information when they need it. CU therefore agrees with the commenters and focus group participants that the owner's manual should be a primary source of information for vehicle owners and a good location for general tire safety information.

CU also believes that it would be useful to consumers if manufacturers provided recommended optional tire size designations in the vehicle manual. With vehicles having greater longevity today, consumers are more likely to need to buy new sets of tires over the course of the vehicle's life. Information from the vehicle manufacturer noting which tire sizes are optimal would be important and useful guidance, we believe.

Tire Load Information

- NHTSA is proposing to keep the maximum load and maximum inflation pressure on the tire sidewall. Based on NHTSA's own research with focus groups, metric units are not intuitive to or understood by many consumers. Moreover, they lack consistency with the proposed tire information loading specification listed in pounds. Therefore, the maximum load and maximum inflation pressure should be listed in English units as primary and metric as secondary units.

Inflation Pressure Information

- We support maintaining the maximum inflation pressure on the sidewall of the tire because it will help prevent over-inflation. But to differentiate the correct inflation pressure from the maximum sidewall listing, we continue to recommend in prominent lettering the statement, “Cold Operating Pressure: Consult the Vehicle Placard.”
- Maximum load and maximum inflation pressure information should be prominently displayed in a standardized format of clear letters of 6 mm or larger on both sidewalls of the tire.
- As the focus group discussion discussed in the NPRM made clear, confusion still exists as to the definition of “cold tire pressure” and may be interpreted as relating to outside weather conditions rather than tire condition. While the proposed rulemaking addresses clarification of the term “cold tire pressure” in a terminology glossary in the owner’s manual, we feel that additional wording on the tire pressure placard should also define “cold tire pressure.”

Lettering may be smaller, but should include wording such as “Cold tire pressure = Tire Pressure at least three hours after the vehicle has been stopped”.

Speed Rating Information

- The NPRM reinforces the need for clarification of the speed rating information. The focus group information indicates that consumers find the alphanumeric coding perplexing. The NPRM also states that “the speed category symbol and load index have not been shown to communicate information effectively” as a reason for not pursuing some of the aspects of the proposed GTS-2000 or ECE (Global Tire Standard and Economic Commission for Europe) specifications for global harmonization. We encourage NHTSA to change the current speed coding, which is not intuitive and often misunderstood by the consumer. The actual

maximum speed should be worded in plain language on the sidewall of the tire as, “Speed Capacity: XXX mph (XXX kph).” This would help consumers to connect the tire’s speed capability to the ECE code appearing after the load index number following the size of the tire.

Consumer Information Campaign

- We suggest that if NHTSA intends to launch a consumer information campaign to help the public better understand care of tires, that the agency include in that campaign information about the effects of loading – and overloading - a vehicle, particularly an SUV, with passengers and cargo. As noted above, there is a fundamental lack of understanding on the part of the consumer about loading an SUV and the effects on the vehicle’s stability.

Likewise, it is generally not understood how easily a vehicle may be overloaded.

CU also recommends as part of this education campaign that NHTSA reach out to automotive service shops, including the chain stores, that provide millions of consumers with services like muffler repair/replacement, oil changes and tire repair services, to encourage a better understanding among their workers about proper tire inflation, and the meaning of “maximum inflation,” and “cold pressure inflation,”

Harmonization

- CU supports NHTSA’s decision to forego harmonizing or adopting foreign or international labeling provisions because of the overriding need for providing safety information in a timely manner. As the agency points out, the labeling requirements in some of the GTS and ECE standards do not contain counterparts for some of the provisions in NHTSA’s current and new requirements, e.g., labeling of maximum permissible inflation pressure on the tire, labeling of passenger and cargo weight on the vehicle. Harmonization, while useful in

bringing international uniformity to safety standards, can never be allowed to diminish the strong safety standards we believe best serve the consumer interest. We fully support NHTSA making safety a priority in the face of pressure to harmonize tire labeling standards.

Costs

- CU agrees with NHTSA's assessment that this regulation would result in minimal costs for tire manufacturers, a total of three million dollars spread across the industry. The total cost for the automobile and tire industry would be approximately five and one-half million dollars. This regulation will, we believe, deliver positive benefits in making tire information more easily accessible in the event of a recall, providing consumers with better, more easily understood information on proper tire inflation and tire care, and give consumers critical information on maximum safe combined passenger-cargo load. We believe the cost of this regulation is modest in light of the benefits it will bring to consumers.

Uniform Tire Quality Grading System

- We ask NHTSA to consider establishing a schedule to propose changes to UTQGS, in regards of providing in plain language the tread-wear capability of the tire. Temperature grades essentially describe the speed capability of a tire and offer redundant and equally confusing information as the ECE speed code, therefore should be eliminated. Traction grades have merit and should be retained, but worded as "Wet Traction" to eliminate confusion with winter weather or dry traction. These two types of traction characteristics could be added to benefit the regional needs of the consumer.
- "Mud and Snow" designation should either be eliminated or be based on performance in those conditions.

Vehicle Placard Information

- Tire pressure should be listed in “psi” first, and “kPa” second. Few consumers understand KPA and few air pressure pumps at service stations and few air pressure gages are calibrated in KPA.
- CU agrees that replacing the term “vehicle capacity weight” with “[t]he combined weight of occupants and cargo should never exceed XXX” will likely make this very important information far more understandable to consumers. But the new terminology “The combined weight of occupants and cargo should never exceed XXX pounds” should clearly state that this is the maximum load without towing, perhaps as a separate row in the placard below the combined weight statement.

Owner’s Manual

- CU supports NHTSA’s intent to require that owner’s manuals for light vehicles contain discussion of the five subject areas: 1) tire labeling; 2) recommended tire inflation, though under this heading we suggest that manufacturers advise owners of the adverse safety consequences of not only under-inflating, but over-inflating tires as well, because over-inflation can adversely effect tire traction and vehicle handling; 3) glossary of tire terminology; 4) tire care, and 5) vehicle load limits.

Lead Time

- NHTSA is proposing to issue a final rule on tire labeling by June 1, 2002 and to phase-in compliance: P-metric tires manufactured on or after September 1, 2003, all LT tires manufactured on or after September 1, 2004, and vehicles manufactured on or after September 1, 2003 must meet compliance. To eliminate consumer confusion, all tires (P-

metric, and LT tires designed for vehicles under 10,000 lbs.) should meet compliance on or after September 1, 2003.

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Respectfully submitted,

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